#### **DEPARTMENT OF HEALTH & HUMAN SERVICES**



Food and Drug Administration Rockville MD 20857

#### TRANSMITTED VIA FACSIMILE

JUL 18 2000

Mr. Douglas N. Dobak Quality Liaison Leader AstraZeneca L.P. 725 Chesterbrook Blvd. Wayne, PA 19087

**RE:** NDA #19-810

Prilosec (omeprazole) Delayed-Release Capsules

MACMIS ID #9086

Dear Mr. Dobak:

This letter concerns AstraZeneca L.P.'s (AstraZeneca's) dissemination of promotional labeling and advertising for Prilosec (omeprazole) Delayed-Release Tablets. The Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed Prilosec promotional materials (sales aids #162159, #162105, #160452, reprint carrier #161856, and advertisement #0120PEOP), as part of its monitoring program and has concluded that AstraZeneca is disseminating materials that contain misleading promotional claims in violation of the Federal Food, Drug, and Cosmetic Act and implementing regulations. A description of our objections follows.

## Misleading Efficacy Claims based on Intragastric pH Levels

Prilosec promotional materials use intragastric pH data from healthy volunteers to suggest that specific levels of intragastric pH acidity correlate with clinical efficacy in the treatment of erosive esophagitis (EE) patients. However, the relationship between specific intragastric pH levels in healthy volunteers and the clinical efficacy of Prilosec in EE patients has not been demonstrated. The use of nonclinical data to suggest a clinical benefit where none exists is misleading. Prilosec promotional materials also use intragastric pH level data to suggest that the clinical effect of Prilosec is superior to that of lansoprazole. The use of nonclinical data to suggest superiority to another drug is misleading.

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For example, Sales Aid #160452 presents a graphical comparison of the lengths of time that Prilosec and lansoprazole each cause intragastric acidity levels in healthy volunteers to exceed a pH value > 4. The graph shows that 20 mg and 40 mg doses of Prilosec result in pH levels > 4 for 53% and 78% of the day respectively, while lansoprazole 30mg and 60 mg doses result in pH levels > 4 for only 46% and 70% of the day respectively. The implication that, at both doses, Prilosec's clinical efficacy depends on its ability to maintain an intragastric pH level > 4 for a certain percentage of time, is misleading. Similarly, the implication that the pattern and extent of Prilosec's daily intragastric acid suppression translates into an improved clinical benefit for Prilosec over lansoprazole in the EE patient, is misleading.

The small, bifurcated statement at the bottom of the page that "Intragastric pH levels are not indicative of efficacy of healing" is not sufficient to correct the overwhelming message that Prilosec's intragastric pH level correlates with clinical benefit. The tiny footnote that P=NS, is also not sufficient to correct the overall misleading message that Prilosec is superior to lansoprazole in clinical effect due to superior acid suppression in healthy volunteers.

#### Misleading Dose-Related Duration of Effect Claims

Prilosec's promotional materials misleadingly suggest that increasing the dose of Prilosec will result in an increased clinical efficacy in the treatment of erosive esophagitis or duodenal ulcers due to the increased duration of Prilosec's antisecretory effect at higher doses. For example, Sales Aid #160452 states that "as you increase the dose of PRILOSEC, you can increase acid inhibition." An accompanying graph shows that the dose of Prilosec 40 mg suppresses acid (pH>3) for a duration of 22 hours a day while lower doses of Prilosec suppress acid for a shorter duration of time throughout the day. Although the Sales Aid is directed at the erosive esophagitis indication, the graph measures pH levels in duodenal ulcer patients. The graph and accompanying text in Sales Aid #160452, implies that both erosive esophagitis and duodenal ulcer patients will benefit from higher doses of Prilosec due to a correlation between increased clinical effect and increased duration of antisecretory effect.

There is, however, no substantial evidence to prove that a dose-related increase in duration of antisecretory action of Prilosec results in an increased clinical benefit in the treatment of EE or duodenal ulcers. In fact, the CLINICAL STUDIES section of the approved product labeling for Prilosec states that [for erosive esophagitis] "the 40 mg dose was not superior to the 20 mg dose of Prilosec in the percentage healing rate." Similarly, the CLINICAL STUDIES section of the approved product labeling for Prilosec states that [for duodenal ulcers] "At 2 and 4 weeks...40mg was not superior to 20 mg of PRILOSEC, and at 8 weeks there was no significant difference..." Thus, the suggestion of improved clinical effect, based on the Prilosec's duration of antisecretory effect in the promotional materials where no such effect has been demonstrated, is misleading.

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## **Promotion of Unapproved Dosage Regimens**

Prilosec promotional materials suggest dosage regimens for the treatment of erosive esophagitis and duodenal ulcers that are not supported by substantial evidence and are inconsistent with approved product labeling for Prilosec. Specifically, these materials promote a dose of 40 mg/day for both conditions for a duration of up to 12 years. Prilosec, however, is indicated for the short-term treatment of both conditions at an approved dose of 20mg/day for a period of 4 to 8 weeks.

- Erosive Esophagitis (EE) The approved product labeling for Prilosec states that Prilosec is indicated for short-term therapy (4-8 weeks) of erosive esophagitis and that the efficacy of Prilosec used for longer than 8 weeks in EE patients has not been established. Prilosec's recommended adult oral dose for erosive esophagitis treatment is 20 mg daily. However, Sales Aid #162105 claims that "No PPI has been proven better in healing erosive esophagitis," that Prilosec has "excellent long-term safety data up to 12 years of follow-up in patients receiving continuous treatment," and that "with Prilosec you can increase the dose to 40 mg without increasing adverse events." This Sales Aid is misleading because it suggests an unapproved dosage regimen for EE. The Sales Aid presents the results of 12-year follow-up safety studies involving Prilosec, implying that Prilosec is safe and effective in the long-term or chronic treatment of erosive esophagitis.
- <u>Duodenal Ulcer Indication Similarly</u>, the approved dose of Prilosec in the short-term treatment of duodenal ulcer is 20 mg per day for a period of four weeks for most patients. Sales Aid #160452 suggests that a 40 mg/day dose of Prilosec is superior to a 20 mg/day dose in the treatment of duodenal ulcers and that a period of continuous therapeutic use up to eleven years is appropriate. The Sales Aid is misleading because its claims are inconsistent with the approved product labeling for Prilosec. The tiny footnote in the Sales Aid stating that the 20 mg dose is indicated for active duodenal ulcer is inadequate to correct the overwhelming message of the large and colorful graph that suggests an increased clinical effect from the 40 mg dose for duodenal ulcer patients, and the text that suggests long-term continuous treatment is appropriate.

## Misleading Comparative Presentations of EE Healing Rates

Reprint Carrier #161856 makes misleading graphical and textual comparisons between the EE healing rates of Prilosec and other Proton Pump Inhibitors (PPIs), based on the Castell study. The upper graph in Reprint Carrier #161856 is entitled "Healing Rates in Patients with Erosive Esophagitis." The graph is misleading because it does not prominently disclose the placebo effect from the Castell Study at 4 and 8 weeks, nor does

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it prominently disclose the lack of statistical significance of some of the numbers shown.

The accompanying statement that "No PPI is proven to work better...for healing all grades of erosive esophagitis in clinical trials" is also not accurate, since the Castell study (and other cited references) did not make head-to-head comparisons between the healing rates of Prilosec and all other PPIs, delineated by each grade of erosion severity. In addition, the reprint carrier presents healing rates for EE that are inconsistent with the approved product labeling.

#### Misrepresentative Healing Rates in Severe EE

Sales Aid #162159 compares a combined EE healing rate of 89% for Prilosec 20 mg in patients with grades 3 and 4 erosive esophagitis, to a combined EE healing rate of 85% for lansoprazole 30 mg. The accompanying text states: "No PPI is proven to work better... in severe erosive esophagitis in clinical trials." The graph, however, misrepresents the extent of Prilosec experience in severe EE patients because it does not present the background incidence rate of patients studied that had the most severe erosions of grade 4. In the actual study, less than 7% of the Prilosec patients (and less than 9% of the lansoprazole patients) had an erosion severity of grade 4, and less than 27% of the Prilosec (and approximately 30% of the lansoprazole patients) had an EE erosion severity rate of grade 3. Thus, the healing rate of 89% for Prilosec and its comparison to healing rate of 85% for lansoprazole, for erosion severity of grades 3 and 4, without additional background incidence, suggests that the drug has been studied in a larger population of grade 4 erosion patients than it actually has been studied. The Sales Aid misrepresents the extent of experience with this drug in healing erosions in grade 4 patients.

#### Misleading Presentation of Clinical Data re Heartburn Relief

Reprint Carrier #161856, (Castell et al), selectively presents data from the Castell study. The front flap of the reprint carrier states that "Prilosec 20mg and lansoprazole 30mg provided comparable decreases in heartburn in patients with EE. There were only minor and inconsistent differences in heartburn symptom assessments." However, on page 1753 of the actual reprint, the article states, "Patient diaries revealed significant differences between active treatment groups in the relief of day and night heartburn (Table 2). Patients receiving lansoprazole 30 mg reported significantly less day and night heartburn during the first day and the first week of treatment than did patients receiving omeprazole 20mg (Table 2). Similar results were observed when diary entries from the intent-to-treat population were evaluated." The Castell reprint summary also stated that lansoprazole provided superior symptomatic relief early in the treatment and was more effective than omeprazole 20 mg with respect to alleviating nighttime heartburn throughout the 8-wk course of therapy. Thus, the claims of comparable heartburn relief between omeprazole and lansoprazole are not supported by the referenced study.

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### **Expanded Indication**

Advertisement #0120PEOP promotes Prilosec for the relief of heartburn without adequately describing Prilosec's approved indication. Prilosec is indicated for the treatment of heartburn and other symptoms associated with gastroesophageal reflux disease (GERD). Heartburn related to GERD or acid reflux disease is heartburn that occurs two (2) or more days a week and persists despite diet or treatment. Prilosec is not indicated for the occasional relief of heartburn in the absence of GERD.

#### Lack of Fair Balance

The promotional materials are lacking in fair balance because the risk information is not presented in a manner that is reasonably comparable to the presentation of promotional claims for PRILOSEC. Promotional materials must present information relating to contraindications, warnings, precautions and adverse effects with a prominence and readability reasonably comparable with the presentation of information relating to the efficacy of the drug.

For example, Sales Aid #162105 states, in large-size colorful header font, that Prilosec has an "Excellent safety record...ZERO cases of ECL cell dysplasia or carcinoids in continuous, open label studies of up to 12 years...With PRILOSEC you can increase the dose to 40mg without increasing adverse events." In much smaller type at the bottom of the page, however, the balancing statements that "Gastroduodenal carcinoids have been reported in patients with Zollinger-Ellison syndrome on long-term treatment with omeprazole. This finding is believed to be a manifestation of the underlying condition, which is known to be associated with such tumors...PRILOSEC should be used only for the conditions, dosage, and duration specified in the Prescribing Information." This important safety information is not presented with reasonably comparable readability to the efficacy claims presented and lacks fair balance.

In addition, some of the Prilosec materials lack important risk information. Sales Aid #162159, for example, states a Prilosec claim for the indication of H. pylori-associated duodenal ulcer disease in combination with clarithromycin and amoxicillin. The Sales Aid, however, fails to include any important risk information that accompanies the use of Prilosec in combination with clarithromycin and amoxicillin. Specifically, the approved product labeling for Prilosec states that clarithromycin is contraindicated in patients with a known hypersensitivity to clarithromycin, erythromycin, or any of the macrolide antibiotics, that clarithromycin is contraindicated in patients receiving cisapride, or pimozide who have pre-existing cardiac abnormalities or electrolyte disturbances, and that clarithromycin should not be used in pregnant women except in circumstances where no alternative therapy is appropriate. If resistance to clarithromycin is demonstrated or susceptibility testing is not possible, alternative antimicrobial therapy should be instituted. The Prilosec labeling also states that amoxicillin is contraindicated in patients with a history of allergic reaction to any of the penicillins.

Reprint Carrier #161856 also fails to provide fair balance. The carrier extensively details the efficacy results of the Castell study on each page, while limiting the safety information related to the study to one statement detailing the three most common adverse events of the study: headache, and diarrhea and abdominal pain. However, in the study, nausea was also a common adverse event, that was not mentioned in the carrier, nor does the carrier mention the severe adverse reactions to omeprazole 20 mg that were experienced by the patients in the study. In the Castell study, four omeprazole 20 mg patients developed severe events that were possibly or probably treatment—related, including rhabdomyolysis, uticarial wheals, severe headache, and severe thromobocytopenic fever.

### **Requested Action**

In order to address these objections, DDMAC requests that AstraZeneca:

- 1. Immediately ceases further use of these and other materials and practices with the same or similar messages.
- 2. Provide DDMAC, in writing, with AstraZeneca's intent to comply with the above. This response should include a list of all violative promotional materials and AstraZeneca's methods for discontinuing their use.

AstraZeneca's response should be received no later than July 28, 2000. If you have any questions, you should direct them to the undersigned in writing or by facsimile at (301) 594-6759 or at the Food and Drug Administration, Division of Drug Marketing, Advertising, and Communications, HFD-42, Rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds AstraZeneca that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #9086 in addition to the NDA number.

Sincerely,

/S/

Patricia Kuker Staub, R.Ph, J.D. Regulatory Review Officer Division of Drug Marketing, Advertising and Communications

# Only PRILOSEC offers all of these benefits:

## ... complete relief of symptoms

24-hour complete relief of heartburn in 84% of GERD patients in controlled studies1\*

# ... more than a decade of long-term safety data

Excellent safety profile in ongoing studies of patients treated continuously for up to 11 years<sup>2</sup>

... America's most prescribed antisecretory, surpassing any H2-RA or PPI

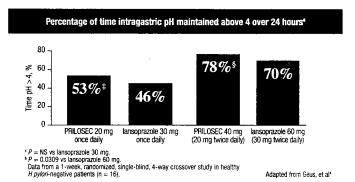
The most frequently reported adverse events with PRILOSEC are headache, diarrhed, and

Symptomatic response to therapy does not preclude the presence of gastric malignancy.

Atrophic gastritis has been noted occasionally in gastric corpus biopsies from patients treated long term with omeprazole.

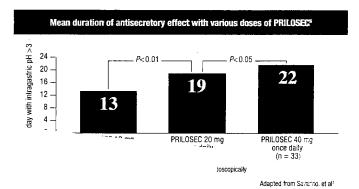
"In 6 studies involving patients with erosive esophagitis, "IMS HEALTH, since May 1997.

# PRILOSEC provides excellent acid suppression



- PRILOSEC 20 mg once daily is appropriate for the majority of acid sufferers<sup>4</sup>
- PRILOSEC 40 mg once daily is appropriate for conditions that require greater acid control

# As you increase the dose of PRILOSEC, you can increase acid inhibition



Intragastric
The most fi
PRILOSEC

- Indicated for h esophagitis, m
- \* Indicated for b Helicobacter \*\* Registered tri
- PRILOSEC s Before presc

References: Acid-inhibit

5. Savarino V, Meia Go. 22.

Please visit our web site at www.prilosec-us.com

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dified in the Prescribing Information.

PRII9. 3. Data on file. DA-PRI27. 4. Geus WP. Mulder P2H. Nicolar IJ. et a. ri-negative healthy subjects. Almost: Pharmacol Ther. 1953;12:329-735. 5 various doses of omeprazole. Dig Dis Sci. 1994;39:161-178.









# **Extensive clinical experience**

- The PPI innovator with more than 18 years of clinical experience worldwide¹
- Over 345 million patient treatments worldwide<sup>2†</sup>

# **Excellent long-term safety data**

 Up to 12 years of follow-up in patients receiving continuous treatment<sup>3</sup>

# Proven efficacy

 No PPI is proven more effective in healing erosive esophagitis<sup>4-11</sup>

The most frequently reported adverse events with PRILOSEC are headache, diarrhea, and abdominal pain. Symptomatic response to therapy does not preclude the presence of gastric malignancy. Atrophic gastritis has been noted occasionally in gastric corpus biopsies from patients treated long term with omeprazole.

PRILOSEC is indicated first line for heartburn and other symptoms associated with gastroesophageal reflux disease (GERD), erosive esophagitis, maintenance of healed erosive esophagitis, active duodenal ulcer, active benign gastric ulcer, pathological hypersecretory conditions, and in combination with clarithromycin and amoxicillin or with clarithromycin for *Helicobacter pylori*-associated duodenal ulcer disease.

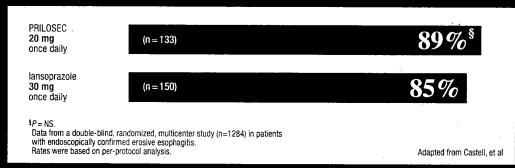
# NO PPI is proven to work better... for healing all grades of erosive esophagitis in clinical trials 111

Healing rates in patients with erosive esophagitis4

PRILOSEC <b>20 mg</b> once daily	4 weeks	(n = 411)	82% <sup>‡</sup>
	8 weeks	(n = 407)	 91%
lansoprazole <b>30 mg</b> once daily	4 weeks	(n = 396)	 83% <sup>‡</sup>
once uany	8 weeks	(n=395)	91%

# in severe erosive esophagitis in clinical trials 4,5,7

8-Week healing rates for patients with baseline esophagitis (grades 3 and 4)4



The most frequently reported adverse events with PRILOSEC are headache. diarrhea, and abdominal pain.

\*A patient treatment is defined as an individual prescription calculated by IMS to be an average of 41.31 counting units. †IMS MIDAS Database 1/89 - 6/99 Registered trademarks of the AstraZeneca group of companies.

PRILOSEC should be used only for the conditions, dosage, and duration specified in the Prescribing Information.

Before prescribing PRILOSEC, please see accompanying full Prescribing Information.

References: 1. Data on file, DA-PRI33. 2. Data on file, DA-PRI34. 3. Data on file, DA-PRI31. 4. Castell DO, Richter JE, Robinson M, et al. Efficacy and safety of lansoprazole in the treatment of erosive reflux esophagitis. Am J Gastroenterol. 1996;91(9):1749-1757. 5. Mee AS, Rowley JL, the Lansoprazole Clinical Research Group. Rapid symptom relief in reflux oesophagitis: a comparison of lansoprazole and omeprazole. Aliment Pharmacol Ther. 1996;10:757-763. 6. Hatlebakk JG, Berstad A, Carling L, et al. Lansoprazole versus omeprazole in short-term treatment of reflux oesophagitis: results of a Scandinavian multicentre trial. Scand J Gastroenterol. 1993;28:224-228. 7. Dekkers CPM, Beker JA, Thjodleifsson B, et al. Double-blind, placebo-controlled comparison of rabeprazole 2D mg vis the treatment of erosive or ulcerative gastro-oesophageal reflux disease. Aliment Pharmacol Ther. 1999;13:49-57. 8. Delchier JC, Cohen G, Humphries TJ. Rabeprazole is omparable in efficacy to omeprazole in erosive GORD and provides more rapid heartburn relief. Gut. 1994;44(suppl 1):A112. 9. Corinaldesi B, Valentini M, Belaïche J, et al. Pantoprazole and omeprazole in the treatment of reflux oesophagitis: a multicentre tvid. Aliment Pharmacol Ther. 1995;9:321-325. 11. Vican F, Belin J, Marek L. Pantoprazole 40 mg versus omeprazole 20 mg in the treatment of reflux oesophagitis: results of a French multicentric double-blind comparative trial. Digestion. 1998;59(suppl 3):608.



FREE OFFER FOR PRILOSEC USERS

# Prilosec sum

bread the word with a FREE phone card.



Get your FREE Phone Card now! 1-888-895-2502

You already know that the makers of prescription PRILOSEC are the experts in acid reflux disease. And that PRILOSEC can help keep you heartburn free. Now you can tell your friends who may suffer from frequent and persistent heartburn about PRILOSEC. Just call today for your free 24-minute phone card.\* And remember to take your PRILOSEC as directed for 24 hours of complete heartburn relief that's possible with PRILOSEC. The most common side effects are headache, diarrhea, and abdominal pain.

\*Offer expires 9/30/00. Limit one per household Please allow 4 to 6 weeks for delivery.

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AstraZen<u>eca</u>

Please read the important Product Information on the following page and discuss it with your doctor.

Please read this summary carefully, and then ask your doctor about PRILOSEC. No advertise does not take the place of careful discussions with your doctor. Only your doctor has the trai ment can provide all the information needed to prescribe a drug. This advertisement ining to weigh the risks and benefits of a prescription drug for you.

# PRILOSEC®\*(OMEPRAZOLE) Delayed-Release Capsules

CLINICAL PHARMACOLOGY Pharmacokinetics and Metabolism: Omegrazole – In pharmacokinetic studies of single 20 mg omegrazole doses, an increase in ALIC of approximately four-fold was noted in Asian subjects compered to Caucasians. Dose adjustment, particularly where mainleance of healing of erosive esophagitis is indicated, for the hepatically impaired and Asian subjects should be considered.

compared to Caucissian. Does adjustment, particularly where maintenance of healing of erosive esophagitis is indicated, for the hepatically impaired and Asian subjects should be considered.

HINDICATIONS AND USABE Dundenst Utere PRILOSEC is indicated for short-term treatment of active doctoral uter. Most particularly where the weeks. Some patients may require an additional 4 weeks of the party PRILOSEC, in combination with clarithromycin and amodellini, is indicated for treatment of patients with H. pylorir infection and dundensal uter diseases (active to up to 1-year history) to tradicate. H. pylorir infection and dundensal uter diseases (active the year PRILOSEC) in combination with clarithromycin, is also indicated for treatment of patients with H. pylorir infection and dundensal uter diseases (active H. pylorir historic many diseases). Principle of the pylorir principle of the py

tions (e.g., Zollinger-Elision syndrome, multiple endocrine adenomas and systemic mastocytosis).

CENTRAJBIOLATIONS. Genegratics: PPILIOSEC Delsynd-fleases Capulous are contraindicated in patients with intown hypersancility to any component of the formulation. Clarifforwaysin: Clarifforwaysin: contraindicated in patients with a known hypersancility to any macrolled antibiotic. Concomitated and indinistration of cartinomych with cisapride, pimozide, or befreadine is contraindicated. Then there elee per marketing reports of drug interactions when clarifforming or syndroming and contraindicated. Then there elee per marketing propries of drug interactions when clarifforming or syndroming resulting in cardiac arrhythmias (OI prolongation, ventriculate tachpendia, ventrality produced interactions of the clarifforming of cardiacy due to inhibition of hepatic metabolism of these diversity of cardiacy in the contrainties of the clarifforming of the cardiacy of the contrainties of the contrainties are provided in the contrainties of the con

(Plasas refer to hall prescribing information for amodicilin before prescribing.)

WANNINGS: Clarithrough: CLARITHROMYCIN SHOULD NOT BE USED IN PREGNANT WOMEN EXCEPT IN CLINICAL CIRCUMSTANCES WHERE NO ALTERNATY: THERAPY IS APPROPRIATE. IF PREGNANCY OCCURS WHILE TAXING CLARITHROMYCIN, THE PATIENT SHOULD BE APPRISED OF THE POTENTIAL HAZARO TO THE FETUS. (See WARNINGS in preserbing information for clarithromycia.) Amodicinis SERIOUS AND OCCASIONALLY FATAL HYPERSENSITIVITY (anaphycicic) REACTIONS NAVE BEEN REPORTED BY ALTERNATIVE OF PRINCIPLE IN THERAPY. THESE REACTIONS ARE MORE LIKELYTO COCCUR IN INDIVIDUALS WITH A HISTORY OF PENGLILLIN HERAPY. THESE REACTIONS ARE MORE LIKELYTO COCCUR IN INDIVIDUALS WITH A HISTORY OF PENGLILLIN HYPERSENSITIVITY AMODICAL AGREFUL INCOMPT SHOULD BE MADE CONCERNING PREVIOUS HYPERSENSITIVITY REACTIONS TO PENGLILLINS. SEPHALOSPORINS OR OTHER ALLERGENS. BEFORE INTENTINT HERAPY WITH AMOXICILLIN, CAREFUL INCOMPTIVED AND PREVIOUS HYPERSENSITIVITY REACTIONS TO PENGLILLINS. SEPHALOSPORINS OR OTHER MALERGENS, FAM ALLERGEN, EACH OF ALLERGENS, EACH ALLERGEN, EACH OF ALLERGEN, EACH OF ALLERGEN, ERRORD SHOULD BE DISCONTINUED AND PAPER-PRIATE THERAPY INSTITUTED. SCHOOLS AMAPHYLACTIC REACTIONS REQUIRE MIMEDIATE EMERGENCY INCLIDING INTUBATION, SOULD ALSO BE ADMINISTERED AS INDICATED, See WARNINGS IN prescribing information of CONCENTRAL SEPHALOSPORISE IN PROPERTY BY A STATISTICOLOGIC. PRESCRIBED SIMILARY MANAGEMENT, INCLUDING INTUBATION, SOULD ALSO BE ADMINISTERED AS INDICATED, See WARNINGS IN prescribing information for the present with distribe subsequent to the administration of ambication of ambication of ambication of the present of the present with the present with distribe subsequent to the administration of ambication of ambication of ambication of the present of the present of the propriet of the ADMINISTRATION of AMBICATION OF THE PRESENTING AND ALLERGEN OF THE PRESENT OF A BROWN OF THE PRESENT OF THE PRESENT OF A BROWN OF THE PROPRIET OF THE PROPRIET OF THE PROPRIET OF THE PROPRIET OF THE

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excreted in human milk, because of the potential for serious adverse reactions in nursing infants from omeprazole, and because of the potential for tumorigeneity shown for omeprazole in rat carrinogenicity studies, a decision should be made whether to discontine runsing or discontinue the drug, taking into account the importance of the drug to the mother. Padiatrie Usa: Safety and effectiveness in pediatric patients have not been established.

ADVERSE REACTIONS: In the U.S. clinical trial population of 465 patients (including duodens) ulcar, Zollinger-Elison syndrome and resistant ulcar patients), the following adverse experiences were reported to occur in 1½ or more of patients on therapy with PRILOSEC\* (omeptracile). Numbers in parenthless indicate percentages of the adverse experiences considered by investigators as possibly, probably, or definitely related to the drug.

	Omeorazole (n=465)	Placebo (n=64)	Ranitidine (n=195)
Headache	6.9 (2.4)	6.3	7.7 (2.6)
Diarrhea	3.0 (1.9)	3.1 (1.6)	2.1 (0.5)
Abdominal Pain	2.4 (0.4)	3.1	2.1
Nausea	2.2 (0.9)	3.1	4.1 (0.5)
URI	1.9	1.6	2.6
Dizziness	1.5 (0.6)	0.0	2.6 (1.0)
Vomiting	1.5 (0.4)	4.7	1.5 (0.5)
Rash	1.5 (1.1)	0.0	0.0
Constipation	1.1 (0.9)	0.0	0.0
Cough	1.1	0.0	1.5
Asthenia	1.1 (0.2)	1.6 (1.6)	1.5 (1.0)
Back Pain	1.1	0.0	0.5

The following adverse reactions which occurred in 1% or more of omeprazole-treated patients have been reported in international double-blind, and open-label, clinical trials in which 2,631 patients and subjects received

Incidence of Adverse Experiences ≥ 1%, Causal Relationship not Assessed

		E-periodice E 114, okoski ricialibiliship not Assessed		
		Omenrazole (n=2631)	Placebo (n=120)	
Body as a Whole, site unspecified	Abdominal pain	5.2	3.3	
	Asthenia	1,3	0.8	
Digestive System	Constipation	1.5	0.8	
	Diarrhea	3.7	2.5	
	Flatulence	2.7	5.8	
	Nausea	4.0	6.7	
	Vomiting	3.2	10.0	
	Acid regurgitation	1.9	3.3	
Nervous System/Psychiatric	Headache	2.9	2.5	

Additional adverse experiences occurring in ct Vs. of patients or subjects in domestic and/or international trials, or occurring since the drug was marketed, are shown below within each body system. In many instances, the relationship to PRILOSEC was unclear. Body As a Whole Within each body system in many instances, the relationship to PRILOSEC was unclear. Body As a Whole Altergier reactions including, rarely, analyticatis (see also Sarb below), fever, pain, fatigue, malaise, abdominal swelling. Cardiovascular: Chest pain or anglina, tachycardia, anorthai, intribute colon, flatated bodo pressure, peripheral edenta. Castraintestinal Pancealitis (see also Sarb below), fever, pain, fatigue, malaise, abdominal swelling. Cardiovascular: Chest pain or anglina, tachycardia, anorthai, intribute colon, flatated bodo pressure, peripheral edenta. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis (see also Astraintestinal Pancealitis), for the part bening and appear to be reversible when treatment is deconfined. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis), and page to be reversible when treatment is deconfined. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis), and page to be reversible when treatment is deconfined. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis), and page to be reversible when treatment is deconfined. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis), and page to be reversible when treatment is deconfined. Castraintestinal Pancealitis (see also Astraintestinal Pancealitis), and page to be reversible when treatment is deconfined. Castraintestinal page and page to be reversible when treatment is deconfined. Castraintestinal page to the treatment of the page treatment of th

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known. Omeprazole is extensively protein bound and is, therefore, not readily dalyzable. In the event of over-dospe, tratement should be symptomate and supportive.

\*\*BOSAGE AND ADMINISTRATION Short-Term Treatment of Active Doudeast Ulser: The recommended adult or all doso of PRILOSEG is 20 mg once daly. Most patients here within it weeks. Some patients may require an additional 4 weeks of therapy. (See INDICATIONS AND USAGE. H. pyfort Endication for the Reduction and Control of the Control of th

Distributed by: Astra Pharmaceuticals, L.P. Wayne, PA 19087, USA

Manufactured by: Merck & Co., Inc. West Point, PA 19486, USA

December 1998 PRI31 NOTE: This summary provides important information about PRILOSEC, if you would like more information, ask your doctor or pharmacist to let you read the professional labeling and then discuss it with them.

# PRILOSECC® (OMEPRAZOLE) 10-MG, 20-MG, 40-MG CAPSULES®

# **Extensive clinical experience**

- The PPI innovator with more than 18 years of clinical experience worldwide<sup>1</sup>
- Over 345 million patient treatments\* worldwide<sup>2†</sup>

# **Excellent long-term safety data**

 Up to 12 years of follow-up in patients receiving continuous treatment<sup>3</sup>

# Proven efficacy

• No PPI is proven more effective in healing erosive esophagitis<sup>4-11</sup>

The most frequently reported adverse events with PRILOSEC are headache, diarrhea, and abdominal pain. Symptomatic response to therapy does not preclude the presence of gastric malignancy. Atrophic gastritis has been noted occasionally in gastric corpus biopsies from patients treated long term with omeprazole.

\*A patient treatment is defined as an individual prescription calculated by IMS to be an average of 41.31 counting units. 
†IMS MIDAS Database 1/89 - 6/99.

PRILOSEC is indicated first line for heartburn and other symptoms associated with gastroesophageal reflux disease (GERD), erosive esophagitis, maintenance of healed erosive esophagitis, active duodenal ulcer, active benign gastric ulcer, pathological hypersecretory conditions, and in combination with clarithromycin and amoxicillin or with clarithromycin for *Helicobacter pylori-associated* duodenal ulcer disease.

# Excellent safety record

PRILOSEC has the longest ongoing clinical study of any PPI up to 12 years<sup>3</sup>

cases of Edit cell displasia or carcinolus lu continuous, open-latet studies of up to 12 years 348

With PRILOSEC you can increase the dose to 40 mg without increasing adverse events 12,13¶

 No dose-related diarrhea observed with PRILOSEC 20-mg or 40-mg capsules<sup>12,13</sup>

Adverse events profile of PRILOSEC is comparable to placebo 12-14

The most frequently reported adverse events with PRILOSEC are headache, diarrhea, and abdominal pain. Atrophic gastritis has been noted occasionally in gastric corpus biopsies from patients treated long term with omeprazole.

<sup>‡</sup>Gastroduodenal carcinoids have been reported in patients with Zollinger-Ellison syndrome on long-term treatment with omeprazole. This finding is believed to be a manifestation of the underlying condition, which is known to be associated with such tumors.

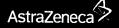
§Patients were refractory to treatment with H2-RAs for either peptic ulcer disease or GERD and received omeprazole 20 mg to 40 mg daily. Follow-up included upper endoscopy with gastric biopsy for mucosal pathology assessment of gastric ECL cells at 12-month intervals and clinical history evaluations at 6-month intervals.

¶PRILOSEC should be used only for the conditions, dosage, and duration specified in the Prescribing Information.

\*Registered trademarks of the AstraZeneca group of companies.

References: 1. Data on file, DA-PRI33. 2. Data on file, DA-PRI34. 3. Data on file, DA-PRI31. 4. Castell DO, Richter JE, Robinson M, et al. Efficacy and safety of lansoprazole in the treatment of erosive reflux esophagitis. Am J Gastroenterol. 1996;91(9):1749-1757. 5. Mee AS, Rowley JL, the Lansoprazole Clinical Research Group. Rapid symptom relief in reflux oesophagitis: a comparison of lansoprazole and omeprazole. Aliment Pharmacol Ther. 1996;10:757-763. 6. Hattebakk JG, Berstad A, Carling L, et al. Lansoprazole versus omeprazole in short-term treatment of reflux oesophagitis: results of a Scandinavian multicentre trial. Scand J Gastroenterol. 1993;28:224-228. 7. Dekkers CPM, Beker JA, Thjodleifsson B, et al. Double-blind, placebo-controlled comparison of rabeprazole 20 mg vs. omeprazole 20 mg in the treatment of erosive or ulcerative gastro-oesophageal reflux disease. Aliment Pharmacol Ther. 1999;13:49-57. 8. Delchier JC, Cohen G, Humphries TJ. Rabeprazole is comparable in efficacy to omeprazole in erosive GORD and provides more rapid heartburn relief. Gut. 1994;44(suppl 1):A112. 9. Corinaldesi R, Valentini M, Belaiche J, et al. Pantoprazole and omeprazole in the treatment of reflux oesophagitis: a European multicentre study. Aliment Pharmacol Ther. 1995;9:667-671. 10. Mösner J, Hölscher AH, Herz R, Schneider A. A double-blind study of pantoprazole and omeprazole in the treatment of reflux oesophagitis: a multicentre trial. Aliment Pharmacol Ther. 1995;9:321-326. 11. Vicari F, Belin J, Marek L. Pantoprazole 40 mg versus omeprazole 20 mg in the treatment of reflux oesophagitis: results of a French multicentric double-blind comparative trial. Digestion. 1998;59(suppl 3):608. 12. Simon TJ, Bradstreet DC. Comparative tolerability profile of omeprazole in clinical trials. Dig Dis Sci. 1991;36(10):1384-1389. 13. Valenzuela JE, Kogut DG, McCullough AJ, et al. Comparative tolerability profile of omeprazole in clinical trials. Dig Dis Sci. 1991;36(10):1384-1389. 13. Valenzuela JE, Kogut DG, McCullough AJ, et al. Compa





# A Comparative Study Demonstrating the Efficacy of Omeprazole and Lansoprazole in Healing Erosive Esophagitis (EE)

# Efficacy and Safety of Lansoprazole in the Treatment of Erosive Reflux Esophagitis

Castell DO, Richter JE, Robinson M, et al. Am J Gastroenterol. 1996;91(9):1749-1757.

This study was supported by TAP Pharmaceuticals.



The most frequently reported adverse events with PRILOSEC are headache, diarrhea, and abdominal pain.

# Castell et al

## **METHODS**

In this double-blind, multicenter study, 1284 patients with endoscopically confirmed erosive reflux esophagitis were randomized to receive omeprazole 20 mg (n = 431), lansoprazole 30 mg (n = 422), lansoprazole 15 mg (n = 218), or placebo (n = 213) once daily for 8 weeks. Healing was evaluated endoscopically at 2-week intervals. Patients kept daily diaries of their symptoms.

# RESULTS—Heartburn Symptom Reduction

- PRILOSEC 20 mg and lansoprazole 30 mg provided comparable decreases in heartburn in patients with EE<sup>1</sup>.
- There were only minor and inconsistent differences in heartburn symptom assessments!

	Investigator Assessment Day and Night heartburn	Patient Diary Assessment	
		Days with heartburn	Nights with heartburn
Week 1 (7-day period)	No significant difference	0.3 fewer with lansoprazole	0.4 fewer with lansoprazole
Week 8 (56-day period)	No significant difference	No significant difference	1.3 fewer with lansoprazole
he clinical valers			Adapted from Castell, et

The clinical relevance of these minor differences is unclear.

Symptomatic response to therapy does not preclude the presence of gastric malignancy.

PRILOSEC should be used only for the conditions, dosage, and duration specified in the Prescribing Information.

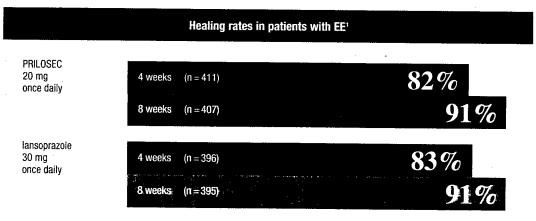
\*Note: This study contains information on the use of lansoprazole 15 mg once daily for the treatment of erosive esophagitis, a dose that is not approved in the product labeling for Prevacid® (lansoprazole). The current recommended adult oral dose of lansoprazole for the treatment of erosive esophagitis is 30 mg once daily. Statements in this publication that lansoprazole dose is superior to omeprazole dose in providing symptomatic relief in erosive esophagitis patients are not approved in the product labeling for Prevacid®.

Prevacid is a registered trademark of TAP Pharmaceuticals Inc.

# Castell et al

# **RESULTS—Healing**

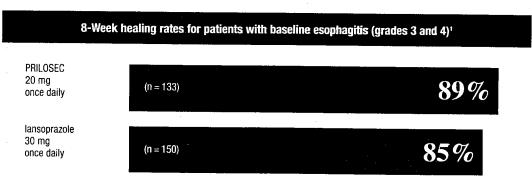
PRILOSEC achieved excellent healing rates in patients with EE<sup>1</sup>.



Rates were based on per-protocol analysis.

Adapted from Castell, et al!

PRILOSEC achieved excellent healing rates in patients with more severe EE<sup>1</sup>.



Rates were based on per-protocol analysis.

Adapted from Castell, et al

The most frequently reported adverse events with PRILOSEC are headache, diarrhea, and abdominal pain.

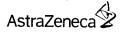
Please see accompanying full Prescribing Information.





\*PRILOSEC is a registered trademark of the AstraZeneca group of companies.

Please visit our web site at www.prilosec-us.com



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